



NOT PROTECTIVELY MARKED

WEST MIDLANDS POLICE

Force Policy Document

POLICY TITLE:	GIFTS, GRATUITIES & HOSPITALITY POLICY
POLICY REFERENCE NO:	PS/06

Executive Summary

The purpose of this document is to inform all West Midland Police officers and staff of the consideration to be made and necessary controls in place when accepting and/or offering gifts and hospitality. It is important that the public has trust in the honesty and integrity of the Force and that all officers and staff recognise, that in order to retain public confidence, transparency and openness is applied.

This policy provides guidelines to ensure that the recording of accepted or declined or provided gifts, hospitality and gratuities is carried out in accordance with the Code of Ethics, Standards of Professional Behaviour and relevant legislation, specifically the Freedom of Information Act 2000, Bribery Act 2010, Prevention of Corruption Act 1906 and the Prevention of Corruption Act 1916.

***Any enquiries in relation to this policy should be made directly with that of the policy contact / department shown below.*

Intended Policy Audience

This policy is aimed at all police officers, staff, special constables and PCSO's, (including where on secondment) including those members of the organisation acting in their capacity as representatives of the Police Federation, Trade Unions, Staff Associations and Support Associations.

Current Version And Effective Date.	Version 4.1	06/02/2015
Business Area Owner	Professional Standards	
Department Responsible	Professional Standards Department	
Policy Contact	DCI Debra Doyle (PSD) 8800 3129	
Policy Author	DCI Debra Doyle (PSD) 8800 3129	
Approved By	ACC Cann	
Policy Initial Implementation Date	01/02/2010	
Review Date	07/01/2016	
Protective Marking	Not Protectively Marked	
Suitable For Publication – Freedom Of Information	Yes (no restrictions – see section 13)	

Supporting Documents

Policy – directly supporting documents

- Gifts and Hospitality recording form WG450 ([click here](#)).
- Code of Ethics ([http://www.college.police.uk/docs/Code of Ethics.pdf](http://www.college.police.uk/docs/Code_of_Ethics.pdf))

Evidence Based Research

Full supporting documentation and evidence of consultation in relation to this policy including that of any version changes for implementation and review, are held with the Force Policy Co-ordinator including that of the authorised original Command Team papers.

PRINTED VERSIONS SHOULD NOT BE RELIED UPON THE MOST UPTO DATE VERSION OF ANY POLICY OR DIRECTIVE CAN BE FOUND ON THE INTRANET

Force Diversity Vision Statement and Values

“Eliminate unlawful discrimination, harassment and victimisation. Advance equality of opportunity and foster good relations by embedding a culture of equality and respect that puts all of our communities, officers and staff at the heart of everything we do. Working together as one we will strive to make a difference to our service delivery by mainstreaming our organisational values”

“All members of the public and communities we serve, all police officers, special constables and police staff members shall receive equal and fair treatment regardless of, age, disability, sex, race, gender reassignment, religion/belief, sexual orientation, marriage/civil partnership and pregnancy/maternity. If you consider this policy could be improved for any of these groups please raise with the author of the policy without delay.”

Code of Ethics

West Midlands Police is committed to ensuring that the Code of Ethics is not simply another piece of paper, poster or laminate, but is at the heart of every policy, procedure, decision and action in policing. The Code of Ethics is about self-awareness, ensuring that everyone in policing feels able to always do the right thing and is confident to challenge colleagues irrespective of their rank, role or position. Every single person working in West Midlands Police is expected to adopt and adhere to the principles and standards set out in the Code.

The main purpose of the Code of Ethics is to be a guide to "good" policing, not something to punish "poor" policing.

The Code describes nine principles and ten standards of behaviour that sets and defines the exemplary standards expected of everyone who works in policing.

Please see http://www.college.police.uk/docs/Code_of_Ethics.pdf for further details.

The policy contained in this document seeks to build upon the overarching principles within the Code to further support people in the organisation to do the right thing.

CONTENTS

1.	INTRODUCTION.....	5
2.	AIMS	5
3.	GENERAL PRINCIPLES	5
4.	DEFINITIONS	6
5.	ACCEPTANCE AND PROVISION OF GIFTS	7
6.	ACCEPTANCE AND PROVISION OF GRATUITIES.....	8
7.	ACCEPTANCE AND PROVISION OF HOSPITALITY	9
8.	DISCOUNTED PRODUCTS AND SERVICES	10
9.	ACTUAL or POTENTIAL FORCE SUPPLIERS or PARTNERS.....	11
10.	ADMINISTRATIVE PROCEDURE.....	11
11.	CONSEQUENCES OF BREACH OF THIS POLICY	13
12.	EQUALITY IMPACT ASSESSMENT (EQIA)	13
13.	HUMAN RIGHTS.....	13
14.	FREEDOM OF INFORMATION (FOI)	13
15.	TRAINING.....	14
16.	PROMOTION / DISTRIBUTION & MARKETING.....	14
17.	REVIEW.....	14
18.	VERSION HISTORY.....	15

Acronyms

EQIA	Equality Impact Assessment
FOI	Freedom of Information Act 2000
GPMS	Government Protected Marking Scheme
LPU	Local Policing Unit
PCSO	Police Community Support Officer
PSD	Professional Standards Department
WMP	West Midlands Police

1. INTRODUCTION

- 1.1. All forms of police corruption are damaging. Corruption undermines investigations, prosecutions, endangers members of the service and impacts on the trust and confidence that our communities have in the West Midlands Police.
- 1.2. West Midlands Police therefore expects and demands the highest levels of honesty and integrity from all police officers, Special Constables, police staff and Police Community Support Officers (PCSO's), (including where on secondment) including those members of the organisation acting in their capacity as representatives of the Police Federation, Trade Unions, Staff Associations and Support Associations. Every member of the force is expected to observe the highest standards of professional behaviour, whether on or off duty. It is of fundamental importance that our communities have confidence in our ability to discharge our functions with fairness and impartiality.
- 1.3. As such, the acceptance or provision of gifts, gratuities and hospitality are likely to have an adverse impact on the integrity of individuals and the effectiveness and reputation of the organisation.
- 1.4. The force recognises that the vast majority of officers and staff behave with honesty and integrity and the acceptance or provision of gifts, gratuities or hospitality, in appropriate circumstances should not be considered detrimental. However, there are occasions when circumstances make the acceptance or provision of gifts, gratuities or hospitality inappropriate.
- 1.5. This policy is intended to protect the integrity of the force and its members and to ensure adherence to the Force Integrity Plan and Force Values for the benefit of the communities that we serve.

2. AIMS

- 2.1. The aims of this policy are to:
 - a. Protect West Midlands Police from corruption and allegations of corruption by supporting the Force Integrity Plan;
 - b. Increase public confidence in West Midlands Police;
 - c. Provide an ethical framework of guidance to members of the force; and
 - d. Ensure fairness, objectivity and proportionality in the application of this policy.

3. GENERAL PRINCIPLES

- 3.1. The general principle governing the offer of any gift, gratuity or hospitality is that it will be declined. A record must be made of any offer, provision or refusal, in the Gifts, Gratuities and Hospitality register in accordance with this policy.
- 3.2. It is accepted however that there will be some occasions where the acceptance or provision of a gift, gratuity or hospitality will be appropriate. In these circumstances the acceptance or provision must ensure the integrity of West Midlands Police and any member of the organisation must not be compromised, or perceived to be compromised, in any way as a result of such acceptance.
- 3.3. A modest degree of hospitality may be welcomed by partners and displays cordiality that can assist working relationships and can be of benefit to the organisation.

NOT PROTECTIVELY MARKED

- 3.4. In any circumstance of gift, gratuity or hospitality, there should be no direct or indirect undue personal gain for individuals involved.
- 3.5. Offers or provisions of a gift, gratuity or hospitality vary widely according to the circumstances; this can range from a genuine offer of a small gift in appreciation of good work to an individual or a team, through to criminal offences of Bribery or Misconduct in Public Office.
- 3.6. The provisions of the Bribery Act 2010 contains two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) at sections 1 and 2 respectively. The provisions of the Act extend the definition of bribery to include seeking (or agreeing) to bring about improper performance of duties, which includes a public function such as policing. Improper performance amounts to any breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.
- 3.7. The Act does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure intended to improve the image of a commercial organisation, to better represent products and services, or to establish cordial relations. It is, however, clear that hospitality and promotional or other similar business expenditure can be employed as bribes. Considerations in this regard will include the degree of lavishness of a gratuity or hospitality, its relative value, the industry norm, and the extent to which the gratuity or hospitality is connected
- 3.8. to the business in question. The existence or otherwise of previously offered or accepted gifts, gratuities or hospitality may also be relevant.
- 3.9. There will be occasions where donors will leave gifts or gratuities for an individual in their absence (for example, a member of the public attends a police station to leave a gift for an officer who is not on duty.) In such circumstances, the principles of this policy will be complied with.
- 3.10. Taking advantage of officially approved discount schemes and arrangements that are open to wide groups, such as those negotiated by Sports and Social Club, Staff Associations or Police Federation will be acceptable, in accordance with this policy.
- 3.11. This policy is intended to avoid any improper influence on the activities and decisions of West Midlands Police, and therefore applies to all officers and staff in the force, including those on secondment or involved with the activities of the Police Federation, Trade Unions, Staff Associations and Support Associations.
- 3.12. The provision, acceptance or refusal of gifts, gratuities or hospitality will be reported on in accordance with this policy; the information gained from which will be recorded in a Force Register and be subject to public disclosure under the terms of the Freedom of Information Publication Scheme.

4. DEFINITIONS

Gift: is defined as any 'item, cash, goods or service which is offered for personal benefit at no cost, or at a cost that is less than its commercial value'.

Gratuity: is defined as 'a gift of money'.

NOT PROTECTIVELY MARKED

Hospitality: is defined as ‘any generous or material welcome or reception that is more than incidental, i.e. more than a beverage or light refreshment, and includes the offer of any free meals, excursions, flights or accommodation’.

5. ACCEPTANCE AND PROVISION OF GIFTS

5.1 All gifts should be politely declined (except where acceptance is provided for within this policy) and an explanation of this policy provided. The only exception to this will include where there is a valid reason to believe that declining the gift may cause serious offence or damage working relationships.

5.2 Genuine and unsolicited gifts of thanks from members of the public or victims of crime may be offered to individual officers or teams in genuine appreciation of outstanding levels of service. Offers of such gifts should be courteously refused in a manner that should not cause offence or embarrassment to the organisation or individual making the offer.

5.3 Should officers or staff believe that such a refusal would cause unnecessary offence or may hinder productive working relationships, acceptance will be possible.

5.4 The following considerations will assist officers and staff in determining the boundaries of acceptability of any gift;

(1) Genuine:

- a. Is this an offer made for reasons of genuine appreciation for something I have done?
- b. Why is the offer being made?
- c. What are the circumstances that have led to the offer?
- d. Have I solicited this offer in any way or does the donor feel obliged to make this offer?

(2) Independent:

- a. Would the offer be seen as reasonable in the eyes of the public?
- b. Would a reasonable bystander be confident that I could remain impartial and independent in all of the circumstances?

(3) Free:

- a. Could I always feel free of any obligation to do something in return?
- b. How do I feel about the propriety of the offer?
- c. What are the donor’s expectations of me should I accept?

(4) Transparent:

- a. Would I be comfortable that my acceptance of this offer was transparent to my force, colleagues and to the public or was reported publicly?
- b. What could be the outcome for the force if this offer was accepted or declined?

5.5 Officers and staff should consider within their determination whether accepting such an offer may be misinterpreted and could lead to inaccurate expectations of favour or service. If any doubt exists about the appropriateness of any gift, or the motive of the person offering such, then it should be declined.

5.6 A gift may only be accepted if:

- (a) It is of trivial or inexpensive nature, (for example; promotional products from a conference or partnership, where the item is of nominal value, for example, key rings, pens, notepads etc.)

NOT PROTECTIVELY MARKED

- (b) It amounts to a small commemorative item, (for example; from visiting national or overseas law enforcement agencies, staff associations, government agencies or similar organisations.)
- (c) It is a genuine, unsolicited and inexpensive gift of thanks from a member of the public, offered to an individual or team in genuine appreciation of outstanding levels of service. (Inexpensive should be determined as having a retail value not exceeding £10.)
- (d) It is accepted on the understanding that the donor is informed that the gift is accepted on behalf of the organisation and that the LPU Commander/ Head of Department will determine the recipient of the gift. (It is acknowledged that some staff on secondment or working in their capacity as Federation, Staff or Union representative may not have a Head of Department to whom they may report, therefore they should report to the most appropriate line manager within West Midlands Police.) It is expected that such gifts as chocolates, biscuits etc will be allowed to be retained by the individual or team receiving the gift; whereas other items will be donated to Force approved charities.

5.7 A gift will not be accepted if:

- (a) It is cash, gift token or voucher, other than donations made to Force approved charities. (Specific guidance on this is provided in section 6.)
- (b) It comprises alcohol, or any other item which may be perceived in a negative light by the public, if accepted by the officer or staff member.
- (c) It is from external contractors or companies tendering for work or business with the force or wider police service (See section 9).
- (d) It is a financial reward resulting from the publication of articles relating to the intended recipients role or duties as a member of the force.

5.8 All offers of gifts, (other than as detailed in para 5.6 (a) above) irrespective of whether refused or accepted, should be subject of a report to the individual officer or staff's Single Point of Contact on LPU/Department/Association. Where the gift is accepted, the grounds for acceptance should be included in the report. (See Procedure in section 10)

6. ACCEPTANCE AND PROVISION OF GRATUITIES

6.1 The offer or provision of a personal gratuity will not be acceptable. This includes the provision or offer of gift tokens or vouchers

6.2 Where a donor wishes to make a donation to charity, they should be directed to attend the local police station or to send in their donation by post. Consider and explain to the donor how it may appear for the officer or staff member to be seen accepting cash from another person. If the donor wishes for their donation to be given to a specific charity, their wish should be honoured. Where the donor indicates that they wish for their donation to be given to a police charity without further definition or direction, such donation should be forwarded to the West Midlands Police Benevolent Fund.

6.3 Any deposits of cash should be treated as a valuable and the donor should sign to confirm the amount donated, in a pocket note book or other receipt.

NOT PROTECTIVELY MARKED

- 6.4 The donation of a gratuity for an individual will not be allowed to be given to that individual.
- 6.5 All offers or provision of gratuities (including charitable donations) irrespective of whether refused or accepted, should be subject of a report to the individual officer or staff's Single Point of Contact on LPU/Department/Association. Where a gratuity is accepted or provided, the grounds for acceptance should be included in the report. (See Procedure in section 10)

7. ACCEPTANCE AND PROVISION OF HOSPITALITY

- 7.1 Hospitality may be accepted or provided if it;
- (a) Extends to the impromptu provision of light refreshments during the course of work functions/duties; (For example, the provision of a cup of tea and biscuits to an officer at a crime scene, or to Union members attending at a meeting or conference.)
 - (b) Is a conventional meal provided during the course of a working day by another police force or partner in law enforcement, community safety partner or Staff or Trade Association, or other organisation.
 - (c) Is a conventional meal and is in accordance with the recipient's work functions/duties; (for example, attendees at a meeting, seminar or conference organised by an external body; the annual dinner of a representative association or local authority which are limited to isolated or infrequent occasions and can be demonstrable in the interests of the force to attend.)
- 7.2 Hospitality will not be acceptable if it amounts to regular free or discounted food or refreshments, whether on duty or off duty, or includes a degree of lavishness which is outside of industry norms or is beyond any sense of common courtesy or reasonableness.
- 7.3 Except as provided for in 7.1, invitations to attend sporting, entertainment or social events will not be acceptable.
- 7.4 Offers of accommodation, holidays, foreign trips or inappropriate entertainment will not be acceptable.
- 7.5 The provision of Hospitality by officers or staff of West Midlands Police may be considered appropriate where there is a justifiable business need. The provision of such Hospitality must be reasonable, proportionate and appropriate in the circumstances, and of course fully auditable, and:
- (a) Must not be offered on the basis of hospitality received or to induce favours;
 - (b) Must not be afforded to the same individual or group of people on a regular basis;
 - (c) Must not be extended to family members of the host or guest.

NOT PROTECTIVELY MARKED

- 7.6. Examples of appropriate hospitality include:
- (a) Hosting other constabularies, for example at Regional Meetings;
 - (b) Recognising achievements of staff or members of the community, such as at awards ceremonies;
 - (c) Providing a forum for the exchange of skills and experience relating to policing or professional related activities.
- 7.7. Gifts, Gratuities or Hospitality that is provided by the force should be recorded on the relevant i-Procurement purchasing system using the relevant cost code.
- 7.8. Hospitality may at times extend to meetings or appointments held for genuine policing business reasons; it is for the officer/police staff member receiving the hospitality to ensure that the purpose of the meeting or appointment is for a genuine policing business and not simply to receive hospitality. If an officer/police staff member identifies that hospitality is provided on a regular basis to members of WMP then this should be reported to the LPU/Departmental Head for further consideration in accordance with this policy. (An example of this would be a coffee shop on the neighbourhood) Hospitality should not be exploited or used in such a way that may damage the reputation of the organisation.
- 7.9. Where the provision or acceptance of hospitality requires approval, then such approval should be obtained from the appropriate authorising person, prior to the hospitality.
- 7.10. All offers or provision of hospitality, (other than as detailed in paragraph 7.1 above) irrespective of whether refused or accepted, should be subject of a report to the individual officer or staff's Single Point of Contact on LPU/Department. Where hospitality is accepted, the grounds for acceptance should be included in the report. (See Procedure in section 10)

8. DISCOUNTED PRODUCTS AND SERVICES

- 8.1 Officers and staff may take advantage of officially approved discount schemes and arrangements in the following circumstances:
- (a) Offers or discounts formally negotiated through the Police Federation, Superintendents Association, Trade Union, WMP Sports & Social Club or other staff association.
 - (b) Discounts offered to public service workers, including the police service.
 - (c) Free travel arrangements, from time to time, formally negotiated and approved by West Midlands Police and in accordance with the relevant policy.
 - (d) Other agreements made between the provider and LPU/Departmental Commander that are in place and recorded in the Gifts & Hospitality Register.
- 8.2 There is no requirement for individuals to report about discounts that meet the circumstances described in para 8.1.

NOT PROTECTIVELY MARKED

- 8.3 (Other than as detailed in paragraph 8.1) Free or discounted goods from any outlet that has a degree of lavishness or is beyond any sense of common courtesy or reasonableness, will not be acceptable. This applies both on and off duty. Where such discount is offered, it should be courteously declined.
- 8.4 Where such discounted offers are made, a supervisor should be informed. Supervisors should advise the person offering such discounts about the terms of this policy and dissuade them from making such offers. It may be appropriate for officers and staff to avoid making purchases from such a retailer to avoid any embarrassment or compromise however this should not impact on normal policing duties. The person making the offer should be advised of the facility to enter into a formal agreement with the Police Federation or other staff association.
- 8.5 Otherwise than already provided for, officers and staff should not seek to gain, or accept offers of, discounts or preferential service or treatment by the use of official warrant or identity cards or by making reference to their role in the police force.
- 8.6 All offers of discounts, (other than as described in paragraph 8.1) irrespective of whether refused or accepted, should be subject of a report to the individual officer or staff's Single Point of Contact on LPU/Department. Where a gratuity is accepted or provided, the grounds for acceptance should be included in the report. (See Procedure in section 10)

9. ACTUAL or POTENTIAL FORCE SUPPLIERS or PARTNERS

- 9.1 Where a gift, gratuity or hospitality is offered by or to an actual or potential Force supplier or partner, then this should be dealt with in accordance with this policy, but with specific reference to the relevant status of the supplier or partner, which should be notified to LPU Commander/Departmental Head. In the case of an actual or potential partner, the relevant LPU Commander/Departmental Head will immediately notify the Contracts and Procurement Unit Manager, Head of the Force Innovation and Integration Partner and Head of Professional Standards.

10. ADMINISTRATIVE PROCEDURE

- 10.1 Where a gift or gratuity has been accepted, the persons receiving it should take it as soon as practicable, and in any event, before they go off that tour of duty, to their police station or place of work, and store it in a secure location while awaiting direction as to what to do with it. Cash and valuable items should be stored in the station or departmental safe or other appropriate secure store.
- 10.2 The person who accepts, or declines a relevant gift, gratuity or hospitality should inform their first line supervisor who will make a record of it, in accordance with the aforementioned requirements. The record will be made on the Gifts, Gratuities and Hospitality Record Form and emailed to their respective LPU/Departmental/Association Single Point of Contact.

NOT PROTECTIVELY MARKED

- 10.3 The record will include:
- (a) The details of the officer or staff member involved;
 - (b) The details of the supervisor notified;
 - (c) The time and date of the offer;
 - (d) The nature of the gift, gratuity or hospitality;
 - (e) The reason or occasion for the hospitality;
 - (f) The true or estimated retail value of the gift, gratuity or hospitality;
 - (g) The full name and address of the donor (this must be obtained from the donor in all cases);
 - (h) The full details of the recipients if it is hospitality provided;
 - (i) Whether it was accepted or declined, and if accepted, the reason for doing so.
 - (j) The details of what action has been taken with the gift, gratuity or hospitality, and an explanation of why that action was taken.
- 10.4 The Single Point of Contact on LPU/Department/Association will maintain a register (WG450 – Intranet Standard Forms) to record the details of all such reports.
- 10.5 LPU Commanders and Departmental Heads should ensure local procedures are in place to ensure that officers and staff, and their supervisors are able to comply with the requirement to report and store such matters before they complete that tour of duty.
- 10.6 LPU Commanders and Departmental Heads should ensure local procedures are in place to ensure that where such a report is made, that they are able to promptly endorse the acceptance of the gift, gratuity or hospitality and determine how they should be dealt with. The decision and rationale for this should also be recorded on the LPU/Departmental/Association register. The presumption should be that, if a gift, gratuity or hospitality is accepted or provided, unless the conditions of paragraphs 5.6 and 7.1 apply, it should be donated to the Chief Constable of the West Midlands Police designated approved charity. (At the time of this policy 'Building Blocks')
- 10.7 Where the recipient is the LPU Commander/Head of Department, a member of Command Team should be notified and provide such endorsement and decision making, which should also be included on the respective LPU/Departmental register. Notification to LPU Commander/Departmental Heads allows for oversight and the provision of appropriate recognition to recipients or providers.
- 10.8 Where the recipient is a member of Command Team (excluding the Chief Constable), the Chief Constable should be notified and provide such endorsement and decision making, which should also be included on the respective Command Team register.
- 10.9 Where the recipient is the Chief Constable, the Police and Crime Commissioner should be notified and provide such endorsement and decision making, which should also be included on the respective Command Team register.
- 10.10 The Single Point of Contact on LPU/Department/Association will, on the first day of each month, notify Professional Standards Department of the contents of their register (including nil returns) so that a force register can be maintained. This should be done by emailing WG450 b_psd_vetting@west-midlands.pnn.police.uk
- 10.11 Professional Standards will maintain a force register which will be subject of scrutiny to ensure compliance with this policy and to identify intelligence and trends. The register will be subject of public disclosure under the Freedom of Information Publication Scheme.
- 10.12 In due course, it is anticipated that a direct on-line recording system will be introduced.

11. CONSEQUENCES OF BREACH OF THIS POLICY

- 11.1 Failure to comply with this policy may constitute a breach of the Standards of Professional Behaviour for police officers and police staff, and may lead to proceedings under the Police Conduct Regulations or the Police Staff Handbook, or criminal proceedings, including under the Bribery Act 2010.

12. EQUALITY IMPACT ASSESSMENT (EQIA)

- 12.1 The Policy has been reviewed and drafted against all protected characteristics in accordance with the Public Sector Equality Duty embodied in the Equality Act 2010. The policy has therefore been Equality Impact Assessed to show how WMP has evidenced 'due regard' to the need to:

- Eliminate discrimination, harassment, and victimisation.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Supporting documentation in the form of an EQIA has been completed and is available for viewing in conjunction with this Policy.

13. HUMAN RIGHTS

- 13.1 This policy has been implemented and reviewed in accordance with that set out with the European Convention and principles provided by the Human Rights Act 1998. The application of this policy has no differential impact on any of the articles within the Act. However, failure as to its implementation would impact on the core duties and values of WMP (and its partners), to uphold the law and serve/protect all members of its community (and beyond) from harm, affecting that of:

- Right to Respect for Private and Family Life (*Article 8 – section 2*):
 - There shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

14. FREEDOM OF INFORMATION (FOI)

- 14.1 Public disclosure of each policy document is determined by the Force Policy Co-ordinator in agreement with its owner. Version 4.0 of this policy document has been GPMS marked as not protectively marked and is fully disclosable to members of the public via the Force WMP internet website.
- 14.2 Public disclosure does not automatically apply to supporting Force policies, directives and associated guidance documents, and in all cases the necessary advice should be sought prior to disclosure to any one of these associated documents.

There are no exemptions to the disclosure of this policy.

NOT PROTECTIVELY MARKED

Which exemptions apply and to which section of the document?	Whole document	Section number

15. TRAINING

15.1 Any training and further guidance required to comply with this policy will be provided under the guidance of the Head of Professional Standards Department.

16. PROMOTION / DISTRIBUTION & MARKETING

- 16.1 The following methods will be adopted to ensure full knowledge of the Policy:
- Policy document and associated documents on the Force Intranet (noticeboard) for the attention of all WMP officers and staff;
 - Recording and audit entry on the Force policy library;
 - Intranet marketing via Professional Standards Department);
 - E-mail distribution to all LPU Commanders and Heads of Department;
 - Advertising via the Corporate Communications Department.

17. REVIEW

- 17.1. The policy business owner Professional Standards Department maintain outright ownership of the policy and any other associated documents and in-turn delegate responsibility to the department/unit responsible for its continued monitoring.
- 17.2. Professional Standards maintain outright ownership and administration of the force register.
- 17.3. The policy should be considered a 'living document' and subject to regular review to reflect upon any Force, Home Office/ACPO, legislative changes, good practice (learning the lessons) both locally and nationally, etc.
- 17.4. A formal review of the policy document, including that of any other potential impacts i.e. EQIA, will be conducted by the date shown as indicated on the first page.
- 17.5. Any amendments to the policy will be conducted and evidenced through the Force Policy Co-ordinator and set out within the version control template.
- 17.6. Feedback is always welcomed by the author/owner and/or Force Policy Co-ordinator as to the content and layout of the policy document and any potential improvements.

CHIEF CONSTABLE

18. VERSION HISTORY.

Version	Date	Reason for Change	Amended/Agreed by.
Version 1.0	23/07/2012	New policy. This policy (version 1.0) supersedes that of Order 02/2010 which is withdrawn with immediate effect.	New Force policy authorised by CC Sims
Version 1.0	28/08/2013	Changed Policy Contact, Dept responsible dets and extended review date	56408 Couchman. Agreed by DCI Julian Harper/Steve Middleditch
Version 1.1	4/11/2013	Change of contact and ownership references throughout the policy and amendment of out dated terms. Inclusion of process flow chart.	56408 Couchman and T/Chief Superintendent Goosen (PSD)
DRAFT - Version 2.0	8/2/2014	Revision of Policy to reflect HMIC guidance and to provide new guidance on dealing with this subject matter,	DCI 9586 DOYLE (PSD)
DRAFT – Version 2(3)	11/7/14	Revision following representations and legal advice	DCI 9586 DOYLE (PSD)
DRAFT – Version 3	13/11/14	Revision following review by ACC Cann	DCI 9586 DOYLE (PSD)
Version 4	8/12/14	Revision following EQIA	DCI Doyle (PSD)
V4	09/01/2015	Policy signed by ACC/CC – Policy published	56408 Couchman
V4.1	06/02/2015	Email address Page 12 amended	56408 Couchman/Adrian Wall